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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

ROCHELLE CHESTER,

Plaintiff,

vs.

COSTCO, and DOES 1 TO 10, inclusive,  
Defendants.

Case No. 2:23-cv-02897-JAM-CKD

(Sacramento County Superior Court Case No.  
34-2022-00329895)

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE JOINT  
STATUS REPORT**

Complaint filed: November 16, 2022

Plaintiff, ROCHELLE CHESTER, and Defendant, COSTCO WHOLESALE CORPORATION, through their respective undersigned counsel, stipulate and request the Court continue the deadline to file a Joint Status Report (“JSR”) from February 12, 2024 to April 12, 2024.

On December 12, 2023, Defendant filed a Notice of Removal from Sacramento Superior Court, Case No. 34-2022-00329895 (“State Court Action”) based on diversity jurisdiction. Plaintiff was properly served, and the Court issued its Order Requiring Service of Process and Joint Status Report on December 22, 2023.

The State Court Action was filed on November 16, 2022, and named Costco as a Defendant. On December 14, 2022, Plaintiff filed a DOE Amendment naming Costco Wholesale Membership, Inc. (DOE 1) as an additional Defendant. On February 7, 2023, Costco Wholesale Membership, Inc. filed its

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Answer to Complaint. Thereafter on November 16, 2023, Defendant COSTCO WHOLESALE CORPORATION, INC. filed its Answer to Complaint as DOE 1, and Defendant Costco Wholesale Membership, Inc. was dismissed without prejudice on November 22, 2023.

During the pendency of the State Court Action, the parties engaged in written discovery and Defendant deposed both Plaintiff and a third-party witness. Plaintiff served Notices of Deposition of Defendant's employee witnesses; however, the parties have agreed to postpone those depositions to participate in mediation. The parties' mediation is scheduled for March 8, 2024.

In light of the parties' attempt to reach an information resolution of the matter through mediation, and the substantial completion of discovery, the parties request a brief continuance of the deadline to file a Joint Status Report from February 12, 2024 to April 12, 2024, or to such other date as the Court deems appropriate.

DATED: January 17, 2024

**McCRARY LAW FIRM, PC**

By: /s/ Jeffrey Fletterick

Daniel L. McCrary, Esq.

Jeffrey Fletterick, Esq.

Counsel for Plaintiff

DATED: January 17, 2024

**MATHENY SEARS LINKERT & JAIME, LLP**

By: /s/ Matthew C. Jaime

Matthew C. Jaime, Esq.

Counsel for Defendant

**ORDER**

Pursuant to the parties' Stipulation, the Court makes the following order:

The deadline to file a Joint Status Report, currently due on February 12, 2024, IS HEREBY **CONTINUED to April 12, 2024.**

IT IS SO ORDERED.

Dated: January 22, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

SENIOR UNITED STATES DISTRICT JUDGE